

United States District Court
District of New Hampshire

JUN 20 2025

John R. Griffin, Jr. v. Bundy LLC AND HUBBELL INCORPORATED
1:24-CV-141-LM-AJ

FILED

Motion For "Legal Fees" Due to Attorney Kevin M. Sibbensen's BAD FAITH behavior in this civil Matter.

- 1.) For the past 15 months, I've done my best to litigate this matter with the proper level of respect for such proceedings. Until very recently, Attorney Kevin M. Sibbensen has continually made outrageous claims, like I said I wanted to kill all Gays, lesbians and trans genders which is something I never said. Attorney Sibbensen has mounted a personal GAY JIHAD against me in this matter, and Case No. 2024-0700 is now pending a decision on just this matter before the NH Supreme Court as I write. I've put a lot of work into this case, and done so honorably. Therefore, I petition the court to order an award of equitable legal fees from Jackson Lewis, P.C. for Attorney Sibbensen's BAD FAITH Jattack upon my character. SEE:

Andrew Hall v. Lorctann Gascard and Nikolas Gascard, Case No. 16-cv-418-sm (D.N.H.) ORDER: "The NH Supreme Court has however, recognized limited exceptions to the general rule... Here, plaintiff seeks fees under the judicially recognized "Bad Faith Litigation exception": "Under the bad faith litigation theory, an award of attorney's fees is appropriate when one party has acted in bad faith, vexatiously, wantonly, or for oppressive reasons, when the litigant's conduct can be characterized as unreasonably obstinate, or obstinate, and when it shall have been unnecessary for the successful party to have brought the action." SEE ALSO:

FRECHETTE V. WAL-MART STORES, INC. 925 F.Supp. 95 Civil No.

94-430-JD "Wrongful termination (Retaliation) NH has long recognized that Public Policy militates against the termination of at-will employees in bad faith. In Monge v. Beitz Rubber Co., the NH Supreme Court held that bad faith termination breached the contract between the employer and at will employee. 114 NH 130, 133, 316 A.2d 549, 551 (1974) The Court later construed Monge to apply only to situations where employee is discharged for performing an act Public Policy would encourage"

I did file an internal Hostile Work Environment Complaint over Bundy's "Woke", Anonymoustipline, and did file OSHA Complaint # 202890 of which Bundy received notification on December 5, 2023. These protected Acts would be in keeping with Public Policy.

FACTS IN FAVOR OF SUMMARY JUDGEMENT

- 1.) I've provided supporting documentation repeatedly in the past 15 months
2.) The Defendants have only offered ever changing hearsay, from anonymous Bundy Employees. (Only I have supplied material facts.) SEE:

2.)

Richard Colman v. State of New Hampshire

Case No. 16-CV-498-LM (D.N.H.)

P.6 "A party moving for Summary Judgement must identify for the District Court the portions of the record that show the absence of any genuine issue of material fact. Floras, Inc v. Airvac, Inc 817 F.3d 849, 853 (1st Cir 2016) "Once the moving party makes the required showing" the burden shifts to the non-moving party, who must with respect to each issue on which he would bear the burden of proof at trial, demonstrate that a trier of fact could reasonably resolve that issue in his favor." Id. This demonstration must be accomplished by reference of materials of evidentiary quality, and that evidence must be more than "merely colorable." Id. The non-moving party's failure to make the requisite showing "entitles" the moving party to summary judgement. Id.

See also:

Timothy G. Fair v Patrick Heon and Maria McKenna Case No. 14-CV-83-PB

(DNH 2016) "To defeat summary judgement" the non-moving party ~~must produce specific facts sufficient to deflect the swing of the Summary Judgement Scythe.~~ must produce specific facts sufficient to deflect the swing of the Summary Judgement Scythe. Xiaoyan Tang v. Citizen's Bank N.A. 821 F.3d 206, 215 (1st Cir 2016); Quoting: Mulvihill v. Top-Flite Golf, Co. 335 F.3d 15, 19 (1st Cir 2003).

Prayer for Relief.

1.) Find that Attorney Kevin M. Sibberensen has been litigating in "Bad Faith" during the first \pm 14 months of this Dispute; By maintaining some type of Gay Vibe against me through his litigation in this case.

2.) Grant equitable monies for all my efforts in this case. ASFR as means of chastizing Attorney Sibberensen and his employer.

Sincerely, John R. Griffin, Jr. John R. Griffin, Jr. June 15, 2025
I state a copy of these motions have been sent to Jackson Lewis P.C.